U.S. FISH AND WILDLIFE SERVICE SPECIES ASSESSMENT AND LISTING PRIORITY ASSIGNMENT FORM

SCIENTIFIC NA	ME: Anaea troglodyta floridalis
COMMON NAM	E: Florida leafwing butterfly
LEAD REGION:	4
INFORMATION	CURRENT AS OF: August 4, 2006
STATUS/ACTIO	N
proposal to list the _X_ New candida Continuing ca Non-p Petition	andidate
a. Is listing b. To date list c. If the ar	TTIONED CANDIDATE SPECIES: g warranted (if yes, see summary of threats below)? , has publication of a proposal to list been precluded by other higher priority ting actions? aswer to a. and b. is "yes", provide an explanation of why the action is ecluded.
Fo Ne Date wher	g priority change rmer LP: ew LP: n the species first became a Candidate (as currently defined): moval: Former LPN:
A - T the cor U - T pro	axon is more abundant or widespread than previously believed or not subject to e degree of threats sufficient to warrant issuance of a proposed listing or intinuance of candidate status. axon not subject to the degree of threats sufficient to warrant issuance of a proposed listing or continuance of candidate status due, in part or totally, to inservation efforts that remove or reduce the threats to the species. ange is no longer a U.S. territory.

I – Insufficient information exists on biological vulnerability and threats to support
listing.
M – Taxon mistakenly included in past notice of review.
N – Taxon does not meet the Act's definition of "species."
X – Taxon believed to be extinct.

ANIMAL/PLANT GROUP AND FAMILY: Insects, Nymphalidae

HISTORICAL STATES/TERRITORIES/COUNTRIES OF OCCURRENCE: Florida, U.S.A.

CURRENT STATES/COUNTIES/TERRITORIES/COUNTRIES OF OCCURRENCE: Florida, Miami-Dade and Monroe Counties, U.S.A.

LAND OWNERSHIP: There are only two small, isolated populations of the Florida leafwing butterfly remaining. The larger occurs on the mainland within Long Pine Key in Everglades National Park (ENP); the smaller occurs on Big Pine Key. On Big Pine Key, the butterfly and its habitat occur within the National Key Deer Refuge (NKDR) and on private, State, and other lands (Salvato 1999, M. Salvato, Service, pers. comm. 2006). On the mainland, pine rockland fragments in Miami-Dade County, in public and private ownership, may still retain the potential to support some small, localized, and sporadic populations of the butterfly (Salvato and Hennessey 2003).

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BIOLOGICAL INFORMATION

Species Description: The Florida leafwing is a medium-sized butterfly approximately 2.75 to 3 inches (in) (76 to 78 millimeters (mm)) in length with a forewing length of 1.3 to 1.5 in (34 to 38 mm) and has an appearance characteristic of its genus (Comstock 1961, Pyle 1981, Opler and Krizek 1984, Minno and Emmel 1993). The upper-wing (or open wing) surface color is red to red-brown, the underside (closed wings) is gray to tan, with a tapered outline, cryptically looking like a dead leaf when the butterfly is at rest. The Florida leafwing exhibits sexual dimorphism, with females being slightly larger and with darker coloring along the wing margins than the males. The species also appears to demonstrate seasonal polymorphism (Salvato and Hennessey 2003). Comstock (1961) employed the terms "summer" and "winter" morph to differentiate between seasonal forms within the genus. The length of photoperiod exposure experienced by fifth-instar larvae (several days prior to pupation), as well as the influence of seasonal moisture have been identified as key factors in determining the seasonal forms within members of this Anaea genus of leafwing butterflies (Riley 1980, 1988a, 1988b; Salvato and Hennessey 2003). The summer form (wet-season or long-day form), occurring in late May to September, tends to have forewing margins that are blunt and a hind-wing with a less pronounced tail; colors also tend to be brighter. The winter form (dry-season or short day form), occurring in October to

early May, tends to have the opposing characters, with pronounced tails and crescent-shaped forewings (Comstock 1961, Salvato 1999, Salvato and Hennessey 2003).

Eggs are spherical and light cream-yellow in color (Worth et al. 1996). The first three instars begin what continues throughout the larval development to be a remarkable co-evolved cryptic mimicry of the hostplant, pineland croton (*Croton linearis*) (Euphorbiaceae). These stages appear like dead leaves, with a brown color and resting on a dead part of the plant during the day (Salvato 1999, in press). These instars tend to eat the leaves to the mid-vein and then dangle from them in camouflage. The two later instars are light green in color, with a tapering body from the cephalad (head capsule) to the caudal end, so that when at rest, it also appears like a croton leaf in the spiral fashion of the terminal end (Worth et al. 1996). The head capsule during all stages bears many tiny setae, presenting the granular appearance of croton seeds (Worth et al. 1996).

Taxonomy: The Florida leafwing butterfly (*Anaea troglodyta floridalis*) was first described by Johnson and Comstock in 1941. The Florida leafwing is a taxon considered to be both endemic to south Florida and clearly derived from Antillean stock (Comstock 1961, Brown and Heineman 1972, Miller and Brown 1981, Minno and Emmel 1993, Smith et al. 1994, Salvato 1999, Hernandez 2004). Some authors (Comstock 1961, Smith et al. 1994, Hernandez 2004) place the Florida leafwing as a distinct species, *A. floridalis*. Others (Brown and Heineman 1972, Miller and Brown 1981, Minno and Emmel 1993, Salvato 1999) consider the Florida leafwing as a subspecies of *Anaea troglodyta* Fabricius. Smith et al. (1994) suggest that further comparison between immature stages of the Florida leafwing and its Antillean relatives may aid in determining whether or not the Florida leafwing is distinct at the species or subspecies level. Miller and Brown (1981) consider *Anaea troglodyta floridalis*, not *A. floridalis*, as the scientific name for the Florida leafwing. The Miller and Brown (1981) checklist is currently under revision; however, no changes will be indicated for *A. troglodyta floridalis*.

We have carefully reviewed the available taxonomic information regarding the Florida leafwing. While there is some disagreement as to whether this butterfly is distinct at the species level (Comstock 1961, Smith et al. 1994, Hernandez 2004) or at the subspecies level (Brown and Heineman 1972, Miller and Brown 1981, Minno and Emmel 1993, Salvato 1999), there is no question that the Florida leafwing is a valid taxon and entity that could be listed pursuant to the Endangered Species Act (ESA).

<u>Habitat/Life History:</u> The Florida leafwing occurs only within pine rocklands that retain its hostplant, pineland croton. Pineland croton, a subtropical species of Antillean origin, is the only known host plant for the leafwing (Opler and Krizek 1984, Schwartz 1987, Minno and Emmel 1993, Smith et al. 1994). Therefore, the leafwing is restricted to pine rocklands that contain pineland croton.

Once occurring throughout the pine rocklands of the lower Florida Keys (Dickson 1955, Folk 1991, Hennessey and Habeck 1991, Salvato 1999), pineland croton now occurs only on Big Pine Key. The last reports of the hostplant from other keys were from No Name in 1992 (Carlson et al. 1993) and from Little Pine (Folk 1991). Recent surveys of relict pineland throughout the

lower keys for pineland croton by Salvato (1999, pers. comm. 2006) have failed to locate the plant from any island other than Big Pine Key. Hennessey and Habeck (1991) and Salvato (1999) estimated that approximately 80 ha (198 acres) of appropriate hostplant-bearing pine rockland habitat occur within NKDR. Another 1,068 ha (2,639 acres) of pine rockland habitat with appropriate hostplant occur within ENP (Hennessey and Habeck 1991, Salvato 1999). Fire is an essential element in maintaining pine rocklands.

Numerous authors have observed and documented the behavior and natural history of this species (Lenczewski 1980, Pyle 1981, Baggett 1982, Opler and Krizek 1984, Schwartz 1987, Hennessey and Habeck 1991, Smith et al. 1994, Worth et al. 1996, Salvato 1999, Salvato and Hennessey 2003). Adults are rapid, wary fliers. The species is extremely territorial, with both sexes flying out to pursue other butterflies (Baggett 1982, Worth et al. 1996, Salvato and Hennessey 2003). The Florida leafwing is multivoltine (i.e., produces multiple generations per year), with an entire life cycle of about 60 days (Hennessey and Habeck 1991), and maintains continuous broods in south Florida throughout the year (Salvato 1999). The precise number of broods per year remains unknown, but the leafwing has been recorded in every month (Baggett 1982, Opler and Krizek 1984, Minno and Emmel, 1993, Salvato 1999, Salvato and Hennessey 2003). Females lay eggs singly on both the upper and lower surface of the host leaves, normally on developing racemes (Baggett 1982, Hennessey and Habeck 1991, Worth et al. 1996, Salvato 1999). Worth et al. (1996) and Salvato (1999) visually estimated that females may fly more than 30 m (98 feet) in search of a suitable host and usually require less than a minute to oviposit each egg.

Adults are not frequently attracted to flowers (Baggett 1982, Opler and Krizek 1984, Worth et al. 1996), but have been observed feeding on rotting fruit and dung (Baggett 1982, Opler and Krizek 1984, Minno and Emmel 1993). Devries (1987) reported that both sexes of the tropical leafwing feed on rotting fruits and dung, while males engage in puddling. Hennessey and Habeck (1991) observed an adult feeding at senescent flowers of saw palmetto (*Serenoa repens*) in Watson's Hammock during 1988. Salvato (1999) observed an adult leafwing feeding on a sliced orange placed at one of his survey transects during an early evening in August 1998. Lenczewski (1980) observed Florida leafwings at the edges of mud puddles in the pine rocklands in the Everglades. Salvato and Hennessey (2003) reported several observations of the Florida leafwing puddling behavior, by males on Big Pine Key and in the Everglades. Adults reared and kept in captivity have not been reported to feed on flowering plants, but have been recorded to frequently feed on various artificial sources (Salvato 1999, Salvato and Hennessey 2003).

<u>Historical Range/Distribution:</u> The Florida leafwing is endemic to south Florida and the lower Florida Keys. The other subspecies of *A. troglodyta* occur allopatrically throughout the West Indies.

The Florida leafwing was locally common within the widespread pine rockland habitat that once occurred within Miami-Dade and Monroe Counties and less common and sporadic within Collier, Martin, Palm Beach, and Broward Counties, Florida (Baggett 1982, Smith et al. 1994, Salvato 1999, Salvato and Hennessey 2003). Historically, pine rockland habitat covered 65,450 ha (161,730 acres) within Miami-Dade County (Loope and Dunevitz 1981, Service 1999).

However, development has removed and/or fragmented the pine rocklands from the majority of the leafwing's former range on peninsular Florida and the lower Florida Keys (Service 1999, Salvato 1999). This rapid loss of habitat and an increased distance between substantial populations of hostplants in the remaining pine rocklands is the most likely cause for the disappearance of the leafwing from the southern Florida mainland and the lower Florida Keys.

As a result of declining habitat and hostplant availability, there is little recent evidence that the Florida leafwing ventured further north than southern Miami-Dade to make use of localized relict populations of hostplants that still persist as far north as Martin County (Salvato1999, Salvato and Hennessey 2003). Furthermore, although the leafwing was widely reported from several locations in southern Miami until the mid-20th century, Salvato (1999) has found few-documented field sighting records or museum collection specimens of this butterfly from areas north of Monroe and Miami-Dade Counties, suggesting that it may not have been common further north historically (Salvato and Hennessey 2003).

<u>Current Range/Distribution:</u> Populations of Florida leafwing have become increasingly localized as pine rockland habitat has been lost or altered through anthropogenic activity (Baggett 1982, Hennessey and Habeck 1991, Schwarz et al. 1996; Salvato 1999, 2001, in press; Salvato and Habeck 2003). The Long Pine Key portion of ENP contains the largest remaining coverage of pine rockland habitat (8,029 ha) (19,840 acres) on peninsular Florida (Salvato 1999, Service 1999, Salvato and Hennessey 2004). However, Hennessey and Habeck (1991) and Salvato (1999) estimated that approximately 1,068 ha (2,638 acres) of appropriate hostplant-bearing pine rockland habitat occur within Long Pine Key (all within ENP) for use by the Florida leafwing.

In Miami-Dade county, outside of ENP, there are approximately 375 pine rockland fragments remaining totaling approximately 1,780 ha (4,398 acres) (DERM 1995, Service 1999). Although several of these pine rockland fragments, particularly ones that are adjacent to ENP, such as Navy Wells Pineland Preserve and Camp Owaissa Bauer Hammock, appear to maintain small, localized populations of pineland croton, Salvato and Hennessey (2003) and Salvato (pers. comm. 2006) have failed to observe the leafwing in these or other mainland areas outside ENP. A GIS analysis conducted by the Service using 2004 data indicates that 65 pine rockland fragments containing pineland croton remain in private ownership in Miami-Dade County; these total approximately 190 ha (470 acres) (The Institute for Regional Conservation (IRC) unpublished data). Another 12 fragments totaling 180 ha (446 acres) contain croton and are in public ownership (IRC unpublished data). The more recent analysis likely under-represents leafwing habitat because it only involved areas where access was allowed and only examined fragments containing croton.

In the lower Florida Keys, Big Pine Key retains the largest undisturbed tracts of pine rockland habitat totaling an estimated 701 ha (1,732 acres) (Folk 1991, Hennessey and Habeck 1991, Salvato and Hennessey 2004). Although relict pine rocklands can still be found on several other islands within NKDR, only Big Pine Key maintains pineland croton (Salvato 1999; Salvato and Hennessey 2003, 2004). As a result, the leafwing is present only on Big Pine Key within the Florida Keys. Hennessey and Habeck (1991) and Salvato (1999) estimated that approximately 80 ha (198 acres) of appropriate hostplant-bearing pine rockland habitat occur within NKDR for

use by the leafwing.

Population Estimates/Status: Based on results of all historic (Baggett 1982, Schwartz 1987, Hennessey and Habeck 1991, Worth et al. 1996, Schwarz et al. 1996) and recent (Salvato 1999, 2001, in press, Salvato and Hennessey 2003; M. Salvato, pers. comm. 2006) survey and natural history studies for this species, there appears to be only two remaining populations of the Florida leafwing. Surveys of the Florida leafwing butterfly by Hennessey and Habeck (1991) and Salvato (1999, 2001) indicated that, while present in many pine rockland locations on Big Pine Key and Long Pine Key, the species was most often encountered in the Watson's Hammock area of NKDR and Gate 4 (trail) within Long Pine Key. Hennessey and Habeck (1991) reported an estimate of 3.7 adult leafwings per ha (1.5 per acre) during 1988-89 from survey transects at both Watson's Hammock and Long Pine Key. During 1997-98, Salvato (1999) recorded higher densities of this species at an estimated 3.6 and 2.6 adults per ha (1.5 and 1.1 per acre) at Watson's Hammock and Gate 4, respectively, than what was found on survey transects elsewhere in the study.

As of mid 2006, Salvato (pers. comm. 2006) has recorded an average of 3.9 adult leafwings per ha (1.6 per acre) in the Watson's Hammock area, while other locations in NKDR have yielded an average of 1.0 to 1.4 adult butterflies per ha (0.4 to 0.6 per acre) during 1997-2006. The higher densities of leafwings in Watson's Hammock have been attributed to the fact this is the only pine rockland area within NKDR restricted from chemical pesticide applications for mosquito control (Hennessey and Habeck 1991; Hennessey et al. 1992; Salvato 1999, 2001). However, analysis of survey data collected from mid-2003 through July 2006 indicate a substantial decline in leafwing numbers on NKDR, even within Watson's Hammock (M. Salvato, pers. comm. 2006). Salvato (pers. comm. 2006) has recorded estimates of 4.9 adult leafwing per ha (2.0 per acre) over the duration of his long-term study on Long Pine Key. Long Pine Key is generally restricted from insecticide applications. Furthermore, unlike the lands outside ENP or much of the NKDR lands outside of Watson's Hammock, both Long Pine Key and Watson's Hammock are managed with prescribed fire, a necessary tool in maintaining native, hostplant-bearing, pine rockland habitat.

Salvato (pers. comm. 2006) generally finds about 1 leafwing per ha (0.4 per acre) during his surveys. Assuming the leafwing is uniformly distributed throughout available habitat within NKDR and ENP, this would translate into a population size of approximately 1,134 butterflies. Salvato (pers. comm. 2006) estimated that the leafwing population collectively at Big Pine Key and Long Pine Key ranges from roughly 100-800 adults at any given time.

THREATS

A. The present or threatened destruction, modification, or curtailment of its habitat or range. The pine rockland community of southern Florida is globally endangered. Destruction of the pinelands for economic development has reduced this unique community by 90% on mainland south Florida (O'Brien 1996) and to 918 ha (2,268 acres) in the lower Florida Keys (Ross et al. 1994). The threat of habitat loss of remaining unprotected pine rocklands continues today. Pine rockland fragments outside of ENP in Miami-Dade County still

contain pineland croton and can provide occupied or suitable habitat for the Florida leafwing. Salvato and Hennessey (2003) and Salvato (pers. comm. 2006) have failed to observe the leafwing in these or other mainland areas outside ENP, but potentially suitable habitat appears to exist on private lands. A recent GIS analysis for Miami-Dade County indicates that 65 pine rockland fragments containing pineland croton remain in private ownership, totaling approximately 190 ha (470 acres) (IRC unpublished data). In short, sporadic populations of Florida leafwing occurring on unprotected lands remain threatened by habitat destruction or modification.

Similarly, while NKDR retains the largest undisturbed tracts of pine rockland habitat in the lower Florida Keys, other areas on Big Pine Key containing occupied and suitable habitat for the Florida leafwing remain unprotected. Therefore, suitable habitat for Florida leafwing outside of NKDR boundaries remains at risk. Residential and commercial development has degraded essential components of Florida leafwing habitat, and continues to pose a threat to remaining habitat.

The threat of habitat destruction or modification is further exacerbated by lack of prescribed fire and suppression of natural fires. Natural fires are an important part of maintaining an ecosystem's gradual succession (Lay 1956, Olson and Platt 1995, Johnson and Miyanshi 1995, Bergh and Wisby 1996, Slocum et al. 2003). Natural fires are important in maintaining the herbaceous layer of pine rocklands of which pineland croton is a part (Loope and Dunevitz 1981, Carlson et al. 1993, Olson and Platt 1995, Bergh and Wisby 1996, Platt et al. 2000). In pine rockland habitat, frequent fires in the dry season burn back the overgrowth of the herbaceous layer, allowing native shrubs to re-sprout from secondary roots under the slash pine canopy. Re-sprouting after burns is the primary mechanism allowing for the persistence of perennial shrubs in pine habitat (Olson and Pratt 1995). Without these fires, climax from tropical pineland to hardwood hammock is rapid. However, due to the proximity of remaining pine rockland habitat to urban areas in southern Florida and the Keys much of these natural fires have been suppressed, often replaced by inconsistent regimes of managed or prescribed fires.

On the southern mainland this process of broad-leaved species overtaking pine rocklands and limiting their reproduction takes about 30 years (Alexander and Dickson 1972, Carlson et al. 1993, Bergh and Wisby 1996). An endemic species can be shaded out of the Long Pine Key pine rocklands in less than 15 years. Loope and Dunevitz (1981) found that a pine rockland left unburned for 35 years had lost all of its endemic plants.

Prescribed fire is used throughout the pine rocklands of Long Pine Key and has been consistently used for the past 50 years (Loope and Dunevitz 1981, Salvato 1999, Salvato and Hennessey 2004). Historically, however, when prescribed burns were conducted in Long Pine Key, the majority of the pine rockland habitat was burned in its entirety. This pattern of burning likely forced populations of leafwing to the fringes of Long Pine Key, greatly fragmenting the species distribution.

The National Park Service's (NPS) fire management goals for ENP are: ensure the health

and safety of firefighters, employees, and the public; use fire in a manner that sustains a healthy and natural ecosystem; protect special values at risk; maintain safe and effective fire readiness; continue to strengthen cooperative fire management activities; enhance visitor experience; and maintain a framework of adaptive management (NPS 2005). Unlike previous fire management plans, the current draft plan incorporates the full range of wildland fire management strategies that may be used throughout the Park (NPS 2005). Management strategies include: wildland fire suppression, wildland fire use, prescribed fire, and non-fire applications.

There have been infrequent wildfires or wildland fire use fires in the pine rockland fire management unit (FMU 3) during the last 20 years (NPS 2005). Within this FMU, agricultural conversion (in the Hole-in-the-Donut) removed 6,250 acres of native vegetation that had the ability to carry fire into the adjacent pinelands on prevailing winds; this disturbance limited the potential for natural fires to occur in the pinelands (NPS 2005). In addition, paved roads, fire roads, and water management features have combined to compartmentalize both prescribed fire and natural fire (NPS 2005).

Since 1989, prescribed fires at Long Pine Key have been conducted every 2-3 years to mimic natural fire regimes historically ignited by lightening strikes (Robertson 1953, Slocum et al. 2003, Salvato and Hennessey 2004). Although this has resulted in restoration of speciesrich, herbaceous-dominated pine rocklands in many areas, including resurgence of pineland croton, the populations of this plant remain fragmented. Although populations of croton remain fragmented, the leafwing, with its strong flight abilities, can disperse to make use of adjacent patches of hostplant and then quickly recolonize the burned areas following hostplant resurgence (Salvato 1999, in press; Salvato and Hennessey 2003).

Since 2001, prescribed fire in FMU 3 has been planned on a landscape scale versus unit scale in part to reduce the effects of compartmentalization (NPS 2005). Current prescribed fire of select portions of pine rockland habitat employed at Long Pine Key aids the leafwing in two ways. First, partial and systematic prescribed burns allow adult butterflies a corridor (refugia) to flee within during the fires. Second, it allows for faster re-colonization by maintaining adult butterflies in areas adjacent to burn sites. In the past, numerous populations of leafwings were likely lost as they fled large-scale prescribed burns and were unable to find appropriate refugia to sustain their numbers within during the burns.

The NPS acknowledges that endangered and threatened species and their habitats are the principle natural values at risk within FMU 3 (NPS 2005). The ENP is working on incorporating considerations for life histories of select butterfly species into its management, but there may be some inconsistencies between implementation of the plan and meeting the needs for select species. For example, portions of Long Pine Key were burned in the early summer of 2005 and suffered substantial hurricane damage (in late summer 2005), which altered regeneration. If remaining areas are burned before previously altered habitat fully regenerates, it could have severe ramifications for the Florida leafwing population at Long Pine Key; however, at this time we do not know whether ENP plans to burn prior to regeneration of previously altered habitat.

Historically, a 10-20 year burn interval maintained pine rocklands on many of the larger islands in NKDR, such as Big Pine, Sugarloaf, and Cudjoe Keys. While on the drier, more isolated parts of the NKDR, such as No Name and Little Pine Keys, this succession takes twice as long. A 10-50 year interval on these smaller islands serves to arrest succession at an intermediate stage.

Fire suppression results in the invasion and replacement of native pine rockland habitat by hardwood hammocks. Native species that would normally be an integral part of the pine rockland ecosystem are at a disadvantage, due to the fact that they can not adjust to the effects of rapid succession and climax. Furthermore, in many instances, native plant species are unable to survive competition from ever increasing invasive plant populations, many of which are far better adapted to make use of these altered ecosystems. The conversion of pine rockland into hardwood hammock continues on northeastern Big Pine, No Name and Little Pine Keys and the leafwing's hostplant is now completely absent from these locations.

The objectives of the current NKDR fire management program are to: (1) protect human life, property, and other resources from unwanted fire; and (2) restore and maintain biological diversity using fire as a viable ecological process (Service 2000). The latter includes maintaining biological diversity in fire-maintained plant communities by prescribed fire and also controlled natural fire under Service guidelines and maintaining habitat for trust resources, including endangered and threatened plant and animal species, especially the Key deer, through prescribed fire and controlled natural fire (Service 2000). The fire management plan for NKDR mentions Florida leafwing and its reliance on its fire-dependent host plant and indicates that "Concern has been raised that fire suppression is contributing to the decline of these species as the host plant requires a fire maintained open pineland to persist (Emmel et al. 1995)." However, no specific details are provided to enhance habitat or avoid / mitigate impacts to Florida leafwing. In addition, management of pine rocklands by NKDR is made particularly difficult by the pattern of land ownership and development; private homes and light commercial uses are embedded within or in close proximity to the fire-sustained pineland habitat (Service 2000).

Limited fire management within Watson's Hammock of NKDR has not curtailed populations of the leafwing, as burns provide resurgent hostplants and the area's relatively small size is not a detriment to this butterfly given its dispersal abilities, which allow it to seek out refugia in adjacent pine rocklands. However, Salvato (1999, in press) has indicated that burns are not being administered as thoroughly in Watson's Hammock as is needed to prevent the loss of pine rocklands. As a result much of the pine rocklands within northern Watson's Hammock are being compromised by hardwood hammock. Therefore, fire and fire management continues to be a threat for this species at NKDR and surrounding lands.

In summary, despite substantial habitat losses, the threat of habitat destruction or modification of remaining unprotected pine rocklands continues today. Sporadic populations of the butterfly and suitable habitat on unprotected pine rocklands outside of ENP and NKDR largely remain at-risk to development. Habitat loss, fire suppression, and lack of fire

management in the past have led to the current fragmentation of remaining habitat. The threat of destruction, modification, or curtailment of habitat due to wildfire and fire management appears to have been lessened on ENP but continues on NKDR and on surrounding private lands in both areas. Additional habitat loss could result in a significant further reduction in the range of this species.

B. Overutilization for commercial, recreational, scientific, or educational purposes. Rare butterflies and moths are highly prized by collectors, and an international trade exists in specimens for both live and decorative markets, as well as the specialist trade that supplies hobbyists, collectors, and researchers (Morris et al. 1991, Williams 1996). The specialist trade differs from both the live and decorative market in that it concentrates on rare and threatened species (U.S. Department of Justice 1993). In general, the rarer the species, the more valuable it is, and prices may exceed U.S. \$2,000 for rare specimens (Morris et al. 1991). For example, during a four-year investigation, special agents of the Service's Office of Law Enforcement executed warrants and seized over 30,000 endangered and/or protected butterflies and beetles, with a total wholesale commercial market value of about \$90,000 in the U.S. In another case, special agents found at least 13 species protected under the ESA, and another 130 species illegally taken from lands administered by the Department of the Interior (U.S. Department of Justice 1995).

Butterflies can be subjected to intense collection pressures, and several listings of butterflies as endangered or threatened species have been based on this threat (notably the Saint Francis' satyr (*Neonympha mitchellii francisci*), emergency-listed (59 FR 18324); callippe (*Speyeria callippe callippe*) and Behren's silverspot butterflies (*Speyeria zerene behrensii*), listed as endangered (62 FR 64306); and Blackburn's sphinx moth (*Manduca blackburni*), listed as endangered (65 FR 4770)). The Saint Francis' satyr was demonstrated to have been significantly impacted by collectors in just a three-year period.

We do not have direct evidence that collection of the Florida leafwing has occurred. Historically, this species, like all leafwings, has been highly sought after by collectors. It is unlikely that collecting or the threat of collection of this species has ceased. Salvato (pers. comm. 2006) has not seen specimens of the leafwing listed by the numerous wholesale and specialty insect dealers who offer and sell butterflies to museums, artists, and collectors. However, Salvato (pers. comm. 2006) has been contacted by numerous individuals requesting specimens of the leafwing or in regards to locations where these individuals may collect them in the field. Thus, there is an established interest in locations and desire for specimens by collectors, researchers, and others.

As this butterfly's rarity becomes known with candidate status, risks of collection may increase. The leafwing's occurrence largely on protected Federal lands may help protect it from overzealous collectors. In the past, when this species was more widespread on Big Pine Key and throughout southern Miami-Dade County, collecting likely exhibited little pressure on this species. At present, even limited collection from the small populations of the leafwing in NKDR or ENP could have deleterious effects on its reproductive and genetic viability and thus could contribute to its eventual extinction. Illegal collection could occur in

ENP or NKDR without being detected since these areas are not actively patrolled. Similarly, in some areas such as Navy Wells, there is no signage indicating collection is prohibited. Consequently, the potential for unauthorized or illegal collection (eggs, larvae, pupae, or adults) exists and could go undetected, despite the protection provided on Federal or other public lands.

In summary, we have no direct / absolute evidence that collection of the Florida leafwing is occurring at this time. However, the established interest in specimens of the leafwing and information requests regarding its location on the part of collectors, researchers, and others suggests that collection may be occurring and has the potential to occur at any time. At the present time, we do not have an adequate basis to conclude that the species is currently threatened by overutilization for commercial, recreational, scientific, or educational purposes at this time. However, due to the fact that there are only two small remaining populations, we believe that collection has the potential to be a serious threat to the species at any time.

C. Disease or predation.

Unlike other members of Anaea, larvae of the Florida leafwing do not make frass chains or roll plant leaves into tubes to evade parasites and predators. During Florida leafwing egg surveys conducted in 1988-89, egg density was estimated to be approximately 11-66 per ha (4-26 per acre) on pineland croton (based on an estimated 80 ha (198 acres) of crotonbearing habitat on Big Pine Key and 1,068 ha (2,638 acres) in the Everglades) (Hennessey and Habeck 1991). Within the pine rocklands, eggs of the leafwing experience a high level of parasitism from trichogrammid wasps (Hymenoptera: Trichogrammidae). Once attacked by the wasps, leafwing eggs turn black (Muyshondt 1975b, Hennessey and Habeck 1991, Salvato 1999, Salvato and Hennessey 2003). The frequency of these "black eggs" was noted to be as high as 100 percent in 1988-89 surveys for the eggs of the leafwing on the hostplant, both in Long Pine Key and Big Pine Key populations of the butterfly (Hennessey and Habeck 1991). Trichogramma sp. near pretiosum Riley "Naranja species" was identified as the parasitoid and appears to be a key mortality factor for the leafwing (Hennessey and Habeck 1991, Salvato 1999, Salvato and Hennessey 2003). Hennessey and Habeck (1991) found the larval hatch rate in the field for all survey areas during their 1988-89 studies, including all mortality sources, ranged from 0 to 33 percent, depending on location and year.

The mite *Balaustium* sp. (Acari: Erythraeidae) has been observed preying upon eggs of the leafwing within the Everglades (Hennessey and Habeck 1991). Crab spiders (Aranea: Thomisidae) are frequently observed in the surveys for the leafwing on pineland croton (Salvato and Hennessey 2003, M. Salvato, pers. comm. 2006). Crab spiders and ambush bugs (Insecta: Phymatidae) feed on leafwing larvae and possibly adults (M. Salvato, pers. comm. 2006). Matteson (1930) recorded ants as predators on leafwing eggs in Miami.

Caldas (1996) found fifth instar larval parasitism by tachinid flies to be as high as 53 percent for *Anaea* (= *Memphis*) *ryphea* Cramer. Devries (1987) indicated that larvae of the tropical leafwing (*Anaea aidea*) experience parasitism from tachinid flies as well as chalcid wasps. Tachinid flies appear to be a parasitoid on the larval stages of the Florida leafwing, laying their eggs on the host plant, which are subsequently ingested. Hennessey and Habeck (1991)

collected a moribund fifth-instar of the Florida leafwing at Long Pine Key. The specimen was host to four larvae of *Chetogena* sp. (Diptera: Tachinidae) that emerged from it in the laboratory; these larvae pupated and became adults. Muyshondt (1975b) obtained a large tachinid species (*Archytas* sp.) from the pupa of the pale-banded leafwing (*Anaea* (= *Memphis*) *pithyusa*).

Hennessey and Habeck (1991) encountered a pupa of the Florida leafwing on Big Pine Key that was in the process of being consumed by ants (species not specified). Muyshondt (1975a) suspected heavy predation on larvae Anaea (= Memphis) morvus boisduvali (no common name) from spiders after witnessing spiders in the proximity of leaves where larvae had been feeding. Spiders appear to prey upon adult Florida leafwing as indicated from a photograph in Glassberg et al. (2000) of a lynx spider (Aranea: Oxyopidae) with a captured adult. However, Rutkowski (1971) watched a spider (species not specified) quickly release an adult Florida leafwing from its web after an initial taste. This suggests the Florida leafwing may be chemically protected from certain predatory species. Salvato (pers. comm. 2006) has examined the bite marks on wings of numerous adult Florida leafwing butterflies in the field indicating a variety birds and lizards are among the predators for this species.

At this time, it is not known to what extent predation or parasitism may be a threat to the Florida leafwing. Parasitism and predation are natural parts of the history of the species, and we have no information suggesting that parasitism or predation is causing a decline in the status of the species. Disease is not known to be a threat to the Florida leafwing.

D. The inadequacy of existing regulatory mechanisms.

Federal, State, and local laws have not been sufficient to prevent past and ongoing impacts to Florida leafwing habitat within the species' historic range. The leafwing has a rounded global status of T1, critically imperiled because of extreme rarity (i.e., 5 or fewer occurrences of less than 1,000 individuals) or because of extreme vulnerability to extinction due to natural or manmade factors (NatureServe 2006). The basis for this ranking stems from the overall threats of destruction of habitat on Big Pine Key, mosquito spraying, fire, and lack of fire, which make this taxon extremely vulnerable to extinction (NatureServe 2006). The leafwing is also considered Threatened by the Florida Committee on Rare and Endangered Plants and Animals (Deyrup and Franz 1994). However, these designations provide no legal authority or protection.

For scientific research on and/or collection of the leafwing at ENP and/or NKDR, a permit is required from the NPS or the Service. Although the leafwing occurs on Federal land which offers protection, these areas are vast and open to the public. Public lands can be heavily used, with signage prohibiting collection often lacking and patrolling / monitoring of activities largely absent. Therefore, potential illegal collection could occur without being detected by National Park Service or Service personnel. Since the leafwing is not listed by the State, it is not protected from being killed and from unauthorized take if encountered outside of NKDR or ENP. Consequently, the potential for unauthorized or illegal collection of the leafwing (eggs, larvae, pupae, or adults) exists, as discussed under Factor B above, and could go undetected.

The 1979 Master Plan is the plan of record for ENP, however the NPS is currently preparing a new General Management Plan for ENP, which is still two to three years from completion (F. Herling, NPS, pers. comm. 2006). At this time, no management alternatives have been selected, but there will likely be emphasis on managing sensitive natural communities of the Park, including pine rocklands (T. Dean, Service, pers. comm. 2006). The current strategic plan for ENP indicates one NPS mission goal as "Natural and cultural resources and associated values are protected, restored and maintained in good condition and managed within their broader ecosystem and cultural context." However, since the new Plan is still in preparation, there is no way of knowing how it will affect the Florida leafwing, nor is there certainty that ENP will have adequate resources to fully implement the Plan once it is adopted.

Similarly, the Comprehensive Conservation Plan is the principal guiding document for National Wildlife Refuges, and the Service is in the process of developing one for NKDR. Although still in the development phase, this Plan will likely focus on management of natural communities, Service trust resources, and threatened and endangered species. It is unknown to what degree the Plan will address the needs of other imperiled species or the extent to which NKDR will have the resources necessary to meet its management needs.

At this time, the protection currently afforded the leafwing is limited, provides little protection to the species' occupied habitat, and includes no provisions to protect suitable but unoccupied habitat. Current management plans for Federal lands do not specifically address the leafwing, and land management practices do not currently incorporate specific life history needs for this species. Given limited resources, the ability to adequately manage fire-dependent pine rocklands on Federal lands both now and in the future remain uncertain. Management is particularly complicated on Big Pine Key, where fire management (see factor A, above) and mosquito control (see factor E, below) need to address the pattern of land ownership and development, with private homes and commercial uses embedded within or in close proximity to NKDR lands. Therefore, we conclude that the existing regulatory mechanisms are inadequate to protect the leafwing and its habitat.

E. Other natural or manmade factors affecting its continued existence.

As the amount of human activity and size of the human population has increased, so has the control of salt marsh mosquitoes (*Aedes sollicitans* (Walker) and *A. taeniorhynchus* (Wiedemann)). To suppress mosquitoes, second-generation organophosphates (naled, malathion) and pyrethroid (permethrin) adulticides are used year-round throughout south Florida and from May to November in the Keys by mosquito control districts (Hennessey et al. 1992, Salvato 1999). The use of pesticides (applied using both aerial and ground-based methods) to control mosquitoes presents collateral effects on non-target species.

The lethal effect of second-generation organophosphate pesticides, such as naled and fenthion, on non-target Lepidoptera was particularly well noted initially in south Florida and the Keys, with the demise of the endangered Schaus' swallowtail butterfly (*Papilio aristodemus ponceanus*) (Emmel and Tucker 1991, Eliazar 1992). This species' dramatic

decline in the early 1970s coincided with the expanded use of chemical pesticides by the Monroe County Mosquito Control District (MCMCD), now known as the Florida Keys Mosquito Control District (FKMCD) on the northern Keys (Emmel and Tucker 1991, Eliazar 1992). When spraying was halted during two periods (1987 and 1989-1992), the species began to recover (Emmel and Tucker 1991, Eliazar 1992). The swallowtail's immediate decline when applications resumed clearly suggested the adverse effect that chemical pesticides have on non-target species. Studies conducted by Hennessey et al. (1992) illustrated the presence of spray residue long after application in the habitat of the Schaus' swallowtail and several other imperiled butterflies. Baggett (1982) suggested that the rapid decline in several populations of butterflies in the Keys was directly attributable to mosquito control insecticide applications.

As of 1989, the following areas in the Florida Keys were designated no-spray zones by agreement between the Service and MCMCD: in the Upper Keys, a strip of land east of Crocodile Lake National Wildlife Refuge (NWR), Elliott Key, and several of the smaller keys of Biscayne National Park; and in the Lower Keys, the small outlying areas of the NKDR. Still, essentially all of the pine rocklands within NKDR except Watson's Hammock on Big Pine Key are sprayed with naled (aerially applied adulticide); additionally, residential areas and roadsides across Big Pine Key are treated with permethrin (ground-based applied adulticide) (Salvato 1999). In short, basically all areas of Big Pine Key, except Watson's Hammock and Cactus Hammock, are sprayed with naled or permethrin. Therefore, Florida leafwing and occupied and suitable habitat on Big Pine Key are directly exposed to adulticides used for mosquito control.

Designation of no-spray zones does not mean a lack of chemical intrusion. These areas were established with the understanding that there was to be no use of insecticides, and any residues detected within would be unacceptable. When these zones were created, pesticide drift downwind into them had not been documented. However, Hennessey et al. (1992) detected naled residues 750 m (2,460 feet) into the no-spray zone at Watson's Hammock, 150 m (492 feet) at Cactus Hammock, and 30 m (98 feet) into the Schaus' swallowtail habitat. Truck-applied ultra-low-volume (ULV) fenthion, sprayed primarily in residential areas, did not appear to drift into non-target areas. This study indicated that naled remained in the habitat well into midday, posing risk to diurnally active non-targets, such as the leafwing. Therefore, in addition to being directly applied to occupied and / or suitable habitat throughout Big Pine Key, the leafwings utilizing Watson's Hammock are also exposed to chemical residues 750 m (2,460 feet) within its borders, despite the protection provided by being within a no-spray zone.

Eliazar (1992) conducted intensive testing on the effects of the chemical pesticides naled and fenthion on several south Florida non-target butterfly species. His results indicated that chemical pesticide and their field application rates, particularly those of naled, were indeed extremely toxic to non-target Lepidoptera, and were being administered in the field at levels above the dosage required to kill target *Aedes* mosquitoes. Eliazar's naled experiments, conducted in the laboratory, included several butterfly species likely to be found in the Lower Keys, including nymphalid butterfly species similar to the leafwing. His results

suggest that naled or fenthion used at the field application rates would have lethal or at least sublethal effects on Florida leafwing when applied in occupied or suitable habitat.

Salvato (1999, 2001) also measured the toxicity of naled as well as permethrin on a number of surrogate species and these adulticides were highly toxic towards these butterflies in both immature and adult stages. Furthermore, Salvato (1999, 2001, pers. comm. 2006) has been monitoring the populations of the leafwing on survey transects on Big Pine Key and Long Pine Key since 1997 and has found the butterfly to be slightly more abundant in areas where insecticide applications are restricted (i.e., Watson's Hammock and Long Pine Key) than in areas where applications occur.

Spraying practices by the FKMCD at NKDR have changed recently to reduce pesticide use. According to the Special Use Permit issued by the Service, the number of aerially applied naled treatments allowed on NKDR has been reduced to a specified allotment (i.e., 9 per mosquito season, no closer than 5 days apart (R. Frakes, Service, pers. comm. 2006)). These changes were made after the Service had reviewed the toxicity of naled on federally listed species that occur within NKDR; however, this analysis did not include species of Lepidoptera, since none on NKDR are listed. Since insects are more sensitive to organophosphates than the vertebrate species considered in the analysis, negative impacts to Florida leafwing and other Lepidoptera from continued naled applications will likely occur, despite the reduced use of this insecticide.

Historically, on Big Pine Key, only Watson's Hammock and eastern Cactus Hammock have been restricted from mosquito control spraying. However, the remainder of Big Pine Key, including the entire NKDR, remains open to adulticide applications. Allowing treatments to pine rockland habitats, even on a reduced basis will continue to negatively affect butterflies and other non-target arthropods. Although subtropical species such as the leafwing may maintain numerous broods throughout the year on Big Pine Key, their densities, even under the best historical conditions, apparently were not prolific enough to survive and adapt to the mosquito control treatments currently occurring on pine rockland habitat (M. Salvato, pers. comm. 2006). Florida leafwing generally has 6 to 10 generations per year of normally only a few hundred individuals, whereas pest species have much more frequent broods throughout the year and in much heavier densities (e.g., for mosquitoes in the millions of individuals). A reduced number of aerial naled applications, such as nine treatments per mosquito season, will likely continue to negatively affect the leafwing. Given the toxicity of naled towards non-target species, frequent exposure of these adulticides cannot be discounted as anything less than a major threat to this species across Big Pine Key.

In general Long Pine Key is generally not impacted by mosquito control practices, except for the use of adulticides in residential areas and campgrounds. However, other sporadic populations of the leafwing adjacent to and outside ENP and other suitable and potential habitat within Miami-Dade County are also vulnerable to the lethal and sublethal effects of adulticide applications.

Butterflies in south Florida and the Keys, such as the Florida leafwing, have adapted over

time to the influence of tropical storms and other forms of adverse weather conditions (M. Salvato, pers. comm. 2006). However, given the substantial reduction in the Florida leafwing's historic range in the past 50 years, the threat and impact of tropical storms and hurricanes on the remaining populations of this species is much greater than when its distribution was more widespread. The active hurricane season of 2005 resulted in extensive damages to pine rockland habitats both within the NKDR and the Everglades. Although there were substantial damages to the Florida leafwing's hostplant in both the Watson's Hammock area of NKDR and Gate 4 (trail) area of Long Pine Key following storm activity, both areas appear to be recovering (M. Salvato, pers. comm. 2006). The possibility of future hurricanes striking the Atlantic or Gulf Coast of Florida is likely. According to the National Oceanographic and Atmospheric Administration, Miami-Dade County, the Keys, and western Cuba are the most storm-prone areas in the Caribbean so this threat is expected to continue.

The Florida leafwing is highly vulnerable to extinction due to its extremely small number of remaining populations that are small and isolated. In general, extreme isolation, whether caused by geographic distance, ecological factors, or reproductive strategy, will likely prevent the influx of new genetic material and can result in a highly inbred population with low viability and/or fecundity (Chesser 1983). Natural fluctuations in rainfall, hostplant vigor, or predation may weaken a population to such an extent that recovery to a viable level would be impossible. Isolation of habitat can prevent recolonization from other sites and result in extinction. Although we do not have evidence that this is the case for the Florida leafwing, the extent of habitat fragmentation leads us to believe this species is vulnerable due to the small number of populations remaining, their small size, and their relative isolation.

The small population size within extremely localized areas may make the leafwing vulnerable to extinction due to genetic drift, inbreeding depression, extreme weather events (e.g. hurricanes), and random or chance changes to the environment (Lande 1988, Smith 1990, Saccheri et al. 1998) that can significantly impact its habitat. Inbreeding depression can result in death, decreased fertility, smaller body size, loss of vigor, reduced fitness, and various chromosome abnormalities (Lande 1988, Smith 1990). Saccheri et al. (1998), studying the effect of inbreeding on local extinction found extinction risk of the Glanville fritillary (*Melitaea cinxia*) increased significantly with decreasing heterozygosity.

Despite a species' evolutionary adaptations for rarity, habitat loss and degradation increase a species' vulnerability to extinction (Noss and Cooperrider 1994). Several authors (e.g., Pimm et al. 1988, Noss and Cooperrider 1994, Thomas 1994, Kale 1996) have indicated that the probability of extinction increases with decreasing habitat availability. Although changes in the environment may cause populations to fluctuate naturally, small and low-density populations are more likely to fluctuate below a minimum viable population (i.e., the minimum or threshold number of individuals needed in a population to persist in a viable state for a given interval) (Shaffer 1981, Shaffer and Samson 1985, Gilpin and Soule 1986). Current threats to the habitat of the leafwing may exacerbate potential problems associated with its low population numbers and increase the chance of this species becoming extinct.

In a review of 27 recovery plans for listed insect species, Schultz and Hammond (2003) found that 25 plans broadly specified metapopulation features in terms of requiring that recovery include multiple population areas (the average number of sites required was 8.2). The six plans quantifying minimum population sizes as part of their recovery criteria ranged from 200 butterflies per site (Oregon silverspot (*Speyeria zerene hippolyta*)) to 100,000 adults (Bay checkerspot (*Euphydryas editha bayensis*)). Although highly dependent upon species, a population of 1,000 has been suggested as marginally viable for an insect (D. Schweitzer, The Nature Conservancy, pers. comm. 2003). Schweitzer (pers. comm. 2003) has also suggested that butterfly populations of less than 200 adults per generation would have difficulty surviving over the long-term. Therefore, the Florida leafwing population at Big Pine Key (i.e., estimated at 80) appears to be especially at risk.

Schultz and Hammond (2003) used population viability analyses to develop quantitative recovery criteria for insects whose population sizes can be estimated and applied this framework in the context of the Fender's blue (*Icaricia icarioides fenderi*), a butterfly listed as endangered in 2000 due to its small population size and limited remaining habitat. They found the Fender's blue to be at high risk of extinction at most of its sites throughout its range despite that fact that the average population at 12 sites examined ranged from 5 to 738. Of the three sites with populations greater than a few hundred butterflies, only one of these had a reasonably high probability of surviving the next 100 years (Schultz and Hammond 2003). Although the conservation needs and biology of the leafwing and Fender's blue are undoubtedly different, most remaining habitat for each species is completely isolated.

The Florida leafwing is largely restricted to two locations, one occurring within pine rocklands of Big Pine Key, a second within Long Pine Key. Distance between these populations and the small size of highly sporadic populations make recolonization unlikely if populations are extirpated.

CONSERVATION MEASURES PLANNED OR IMPLEMENTED

Although not specifically conducted for this species, fire management practices of pine rocklands within ENP and potentially NKDR may provide benefits for the Florida leafwing. The *Florida Comprehensive Wildlife Conservation Strategy* discusses management of pine rocklands, but has not been implemented or funded.

SUMMARY OF THREATS

At its only known locations, the Florida leafwing and its habitat are vulnerable to a wide variety of natural and human factors. The small, isolated populations are exposed to extreme weather events (e.g., hurricanes). Mosquito control practices are a major threat to the population on Big Pine Key, including the NKDR, which is one of only two remaining. Habitat of the leafwing, pine rocklands, is globally imperiled and dependent upon fire. Inappropriate fire management or wildfire could destroy the leafwing and impact the availability of pineland croton, its sole host plant. Further reduction of the populations, especially due to catastrophic weather, mosquito spraying, loss of remaining unprotected suitable habitat, or inappropriate fire management, could severely reduce the likelihood of this butterfly's survival. Finally, the established interest in specimens of the leafwing and information requests regarding its location on the part of

collectors, researchers, and others suggests that collection may be occurring and has the potential to occur at any time. At the present time, however, there is insufficient information to conclude that the species is currently threatened by overutilization for commercial, recreational, scientific, or educational purposes.

RECOMMENDED CONSERVATION MEASURES

- Address concerns regarding impacts of mosquito control activities in relation to pine rockland habitats on NKDR and adjacent properties.
- Review and adjust fire management practices as needed to help maintain or expand the population size or numbers of populations.
- Protect remnant patches of pine rocklands and use of prescribed fire to restore native plant diversity.
- Restore pineland croton to relict fragments of pine rocklands within the leafwing's historic range to expand its occupied habitat.

LISTING PRIORITY

THREAT			
Magnitude	Immediacy	Taxonomy	Priority
High	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	1 2 3* 4 5 6
Moderate to Low	Imminent Non-imminent	Monotypic genus Species Subspecies/population Monotypic genus Species Subspecies/population	7 8 9 10 11 12

Rationale for listing priority number:

Magnitude: The Florida leafwing is threatened by the combined influences of habitat destruction and modification from continued loss of unprotected pine rocklands and wildfire or fire management on protected sites. Mosquito control activities are a serious threat to the butterfly at NKDR, one of its two remaining populations, as well as anywhere the species occurs outside of ENP. Loss of genetic diversity may be a problem of the butterfly considering its small, fragmented, and isolated populations. The probability for catastrophic events (e.g., hurricanes) and the possibility of accidental harm or habitat destruction are considered threats to

the survival of this butterfly, due to the small population size at few remaining locations. In addition to these threats, displacement of native hostplants by invasive exotic species and inadequate regulatory protection continue to pose threats to the species throughout its historic range. Overall, we find that these threats are of high magnitude. We also recognize that illegal collection is a potential threat to the species.

Imminence: The threats of habitat destruction and modification are occurring with the continued loss of unprotected pine rocklands and wildfire or fire management on protected sites. The Florida leafwing continues to be negatively impacted by adulticides used for mosquito control on Big Pine Key and outside of ENP. The threat from loss of genetic diversity within small, fragmented, and isolated populations is expected to continue. The likelihood of extreme weather or catastrophic events (e.g., hurricanes) to both of the remaining populations also seriously threatens the survival of this butterfly, and these threats are expected to continue. We find the above threats to be currently occurring and imminent. In addition, since there is an established interest in locations and desire for specimens by collectors, researchers, and others, we believe this species is at-risk to collection and that this may be occurring and has the potential to occur unnoticed at any time, since areas are remote and open to the public.

Rationale for Change in Listing Priority Number (insert if appropriate)

Yes Have you promptly reviewed all of the information received regarding the species for the purpose of determining whether emergency listing is needed?

Is Emergency Listing Warranted? No. At this time, emergency listing is not warranted because there are two populations of the Florida leafwing on Federal lands, with the population ranging from 100 - 800 adults at any given time. Since this butterfly is being regularly monitored, the Service should be aware of any further reduction in the number of populations, changes in size of its population, and degradation of habitat in a timely manner to undertake emergency listing, should it be necessary.

DESCRIPTION OF MONITORING:

Surveys for the Florida leafwing butterfly are ongoing. Salvato (1999, 2001, pers. comm. 2006; Salvato and Hennessey 2003) continues monitoring efforts for the species that began in 1997 and have been conducted either monthly or bi-monthly throughout the historic range of the Florida leafwing butterfly in south Florida and the lower Keys. The Service is working with Salvato, in the form of providing annual Special Use Permits for mark-release studies in NKDR, to monitor the species. Similar cooperation is given to Salvato by the National Park Service for monitoring the species within ENP.

COORDINATION WITH STATES

Indicate which State(s) (within the range of the species) provided information or comments on the species or latest species assessment: None.

Indicate which State(s) did not provide any information or comments: Florida. A previous version of this form, dated October 13, 2005, was sent to the Florida Fish and Wildlife

Conservation Commission, the National Park Service, and the NKDR; however, no comments or additional information have been received to date.

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APPROVAL/CONCURRENCE: Lead Regions must obtain written concurrence from all other Regions within the range of the species before recommending changes, including elevations or removals from candidate status and listing priority changes; the Regional Director must approve all such recommendations. The Director must concur on all resubmitted 12-month petition findings, additions or removal of species from candidate status, and listing priority changes.

Approve:	/s/ Jeffrey M. Fleming	8/4/2006
	Acting Regional Director, Fish and Wildlife Service	e Date
	Marchall Jones Jr.	
Concur:	Director, Fish and Wildlife Service	August 23, 2006 Date
Do not concur	:	Date
Director's Rem	narks:	
	review: October 13, 2005; updated August 4, 2006 Paula Halupa, South Florida Ecological Services O	